



**United States Environmental Protection Agency
Region I - New England
5 Post Office Square, Suite 100
Boston, MA 02109-3912**

JUN 25 2010

Frank Basile, General Manager
Berkshire Power, LLC
36 Moylan Lane
Agawam, MA 01001

Re: May 6, 2010 Inspection.

Dear Mr. Basile:

On May 6, 2010, the U.S. Environmental Protection Agency - New England (the "EPA") conducted an inspection at Berkshire Power, LLC, located in Agawam, Massachusetts. The EPA would like to thank you and your staff for assisting us during the inspection.

The purpose of the inspection is to evaluate Berkshire Power's operations under EPA's Oil Pollution Prevention Regulations at 40 C.F.R. Part 112, Storm Water Regulations at 40 C.F.R. Part 122, and the General Pretreatment Regulations at 40 C.F.R. Part 403. Comments from the inspection are noted below, and in Attachment A.

At the time of the inspection EPA observed bulk oil storage containers that have storage capacity greater than 1,320-gallons. Because of the location and configuration of Berkshire Power's property, there is reasonable potential for oil, in the event of a spill, to reach surface waters. Berkshire Power's facility is subject to EPA's Oil Pollution Prevention Regulation. Berkshire Power is required to develop and implement a Spill Prevention, Control, and Countermeasure ("SPCC") Plan. At the time of the inspection, Berkshire Power provided EPA with a SPCC Plan¹. The EPA reviewed the SPCC Plan using the EPA's *SPCC Field Inspection and Plan Review Checklist*. Results from the review are also included in this report.

Berkshire Power operates a natural gas-fired power generation plant. The plant has the ability to generate as much as 270 megawatts of electricity using natural gas as the plant's primary fuel source. The plant also has the ability to store oil and (if need be) use it as a back up fuel energy source. The plant has the potential to store oil in a 500,000-gallon aboveground tank. However, at the present time, the plant's burners do not have the ability to burn oil, and the 500,000-gallon aboveground tank is permanently closed.

Berkshire Power's primary standard industrial classification ("SIC") code is 4911, Steam Electric Generating Facilities. The facility consists of several buildings situated on a ten (10) plus acre site. The site has a single drainage area. Storm water runoff drains to a detention pond which has the potential to discharge, by way of a valve, into a storm water sewer system. The system ultimately drains storm

¹ September 2008, prepared by Tighe & Bond.

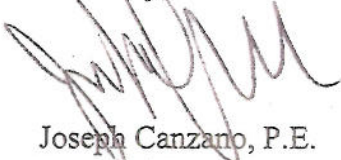
waters to an unnamed wetlands system which drains to Worthington Brook.

Storm waters discharged from Berkshire Power's property are permitted under EPA's September 29, 2008 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities (the "2008 MSGP"). Berkshire Power prepared and is implementing a Stormwater Pollution Prevention Plan ("SWPPP").

Process waste waters introduced into the City of Springfield's Publicly Owned Treatment Works ("POTW") are subject to the EPA's General Pretreatment Regulations at 40 C.F.R. Part 403, City's federally approved Industrial Pretreatment Program, and the EPA's Steam Electric Power Point Source Regulations at 40 C.F.R. Part 423.

Within 30 days of receiving this letter, please provide the EPA with a response that indicates what has been done, or what will be done, regarding certain issues identified in this letter. If you have any questions regarding the information in this letter, you may reach me at (617) 918-1763 or e-mail me at "canzano.joseph@epa.gov."

Sincerely,



Joseph Canzano, P.E.

Regional Pretreatment, Stormwater & SPCC Compliance Coordinator
Office of Environmental Stewardship

cc: ✓ Town of Springfield Water Pollution Control Facility

Attachment A

**Berkshire Power, LLC
36 Moylan Lane
Agawam, MA 01001**

May 6, 2010 Inspection

Industrial Pretreatment:

- Pollutants introduced into the POTW from Berkshire Power's cooling tower blow-down are subject to the EPA's Steam Electric Power Point Source Regulations at 40 C.F.R. § 423.17, General Pretreatment Regulations at 40 C.F.R. Part 403, and the City of Springfield's (the "City") federally approved Industrial Pretreatment Program ("IPP").
- Pollutants introduced into the POTW from Berkshire Power's floor drain system, water demineralization operation, and any other process waste waters are subject to the EPA's General Pretreatment Regulations at 40 C.F.R. Part 403, and the City's IPP.
- Process waste waters introduced into the POTW are permitted by the City. The City's permit (Permit No. 24200) was signed by the City on October 24, 2006. The effective and expiration date of the permit is November 1, 2006, through October 31, 2007, respectively.
- According to Berkshire Power, the discharge of categorical waste waters (i.e., cooling tower blow-down) occurs twice per year. In accordance with 40 C.F.R. § 423.17(2) Berkshire Power is permitted to determine compliance by conducting an engineering calculation which demonstrate pollutants of concern are not detectable in Berkshire Power's final discharge to the POTW. Even though the City is permitting Berkshire Power to demonstrate compliance through engineering calculations, the Region recommends Berkshire Power, at least once every (5) five years, conduct compliance monitoring for pollutants of concern regulated under 40 C.F.R. § 423.17. Monitoring shall occur at the end-of-process and prior to combining with other waste waters, and during a time period when Berkshire Power is discharging cooling tower blow-down waste waters.
- Process waste waters from the plant flow to an oil-water separator prior to being introduced into the POTW. Down stream from the oil-water separator is Berkshire Power's compliance monitoring point. During the inspection the Region observed Berkshire Power's oil-water separator unit - no excessive oil was observed in the unit's chambers. The integrity of unit appeared to be in good operating condition. Maintenance (pumping and cleaning) records associated with the unit shall be maintained.
- Process waste waters are collected for analyses from a certain manhole using a time-proportioned automatic composite sampler. The sampler is in a refrigerator. The sampler and refrigerator is owned, operated and maintained by Berkshire Power. The EPA observed the refrigerator's interior to be dirty. Please clean the unit periodically in order to avoid cross-contamination of samples.

Stormwater:

- Storm waters from Berkshire Power's property are permitted under EPA's 2008 MSGP. Berkshire Power's SWPPP is dated September 2008, with a revision date of April 2009. The SWPPP is dated September 2008, and was revised April 2009. As a matter of information, EPA's 2008 MSGP expires September 29, 2013.
- Berkshire Power's storm waters are subject to the Steam Electric Generating Facilities, Sector O sub-sector within the 2008 MSGP. The site has a single drainage area which drains to a detention basin. Storm waters, and certain containment areas for certain chemical tanks, drain to a trench system which surrounds the plant. The basin, if the valve is in the open position, has the potential to discharge to a storm water sanitary sewer system, which ultimately discharges to an unnamed wetlands which drains to Worthington Brook. Following the basin, storm waters flow to an oil-water separator unit². During the inspection, the EPA did not observed the unit's interior compartments. Maintenance (pumping and cleaning) records associated with the unit shall be maintained.
- EPA recommended to Berkshire Power during the site walk, Berkshire Power identify and label the location of all outfalls, and be able to have accessibility to the outfall, even during winter months. At the moment, the outfall is not accessible from Berkshire Power's property. During the inspection, EPA was not able to inspect the outfall, however storm waters in the basin appeared to be clear and free of distinctly visible floating scum and oils.
- The fill and drain piping and valves associated with Berkshire Power's ammonia tank are not locked. The EPA strongly recommends Berkshire Power provide a security system (lock) for the its ammonia tank's valves.
- At the present time, Berkshire Power is collecting storm water samples at certain culverts which drain into the plant's trench system which drains into the detention basin. Berkshire Power should be collecting storm water samples at the outfall. Collecting samples at the outfall will enable Berkshire Power to also observe and document surface water conditions and quality of storm water discharges. Part 4.3.2 of the 2008 MSGP requires documentation for "evidence of pollutants discharging to receiving waters at all facility outfall(s), and condition of and around the outfall, including flow dissipation measures to prevent scouring".

Spill Prevention, Control & Countermeasure ("SPCC"):

- Berkshire Power, at the time of the inspection, provided EPA with a SPCC Plan. The EPA has reviewed the SPCC Plan in more detail, see *SPCC Field Inspection and Plan Review Checklist*.
- Berkshire Power has a 500,000-gallon aboveground fuel oil tank. In accordance with 40 C.F.R. § 112.2, the tank is "permanently closed".
- The facility's site plan diagram³ is unclear and confusing. The diagram is populated with

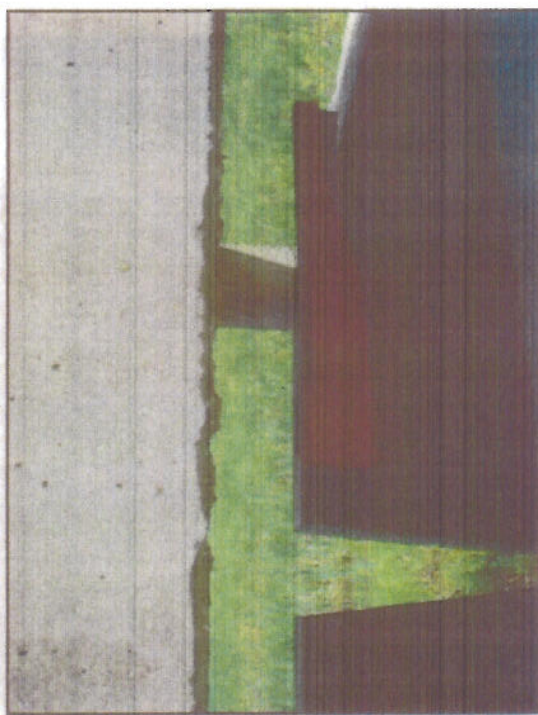
² Identified in the field as "#1 Oil and Water Separator".

³ Prepared by Tighe & Bond, dated September 2008.

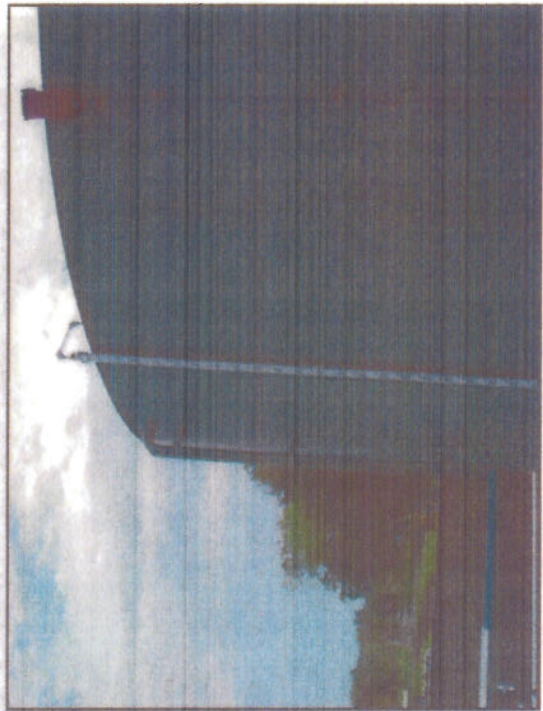
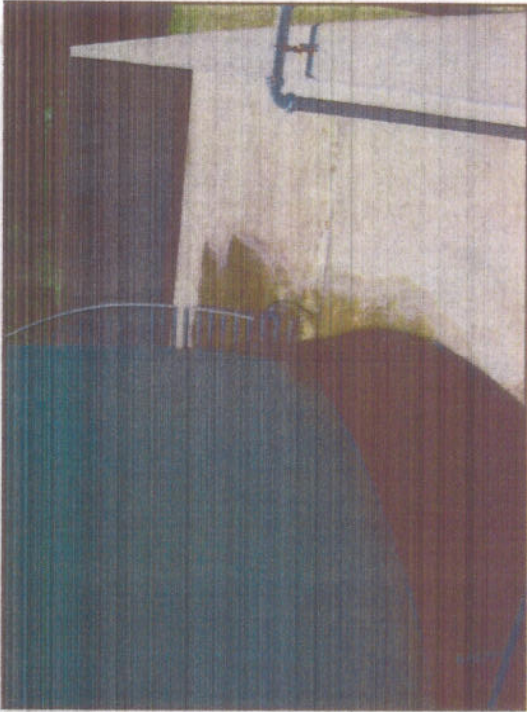
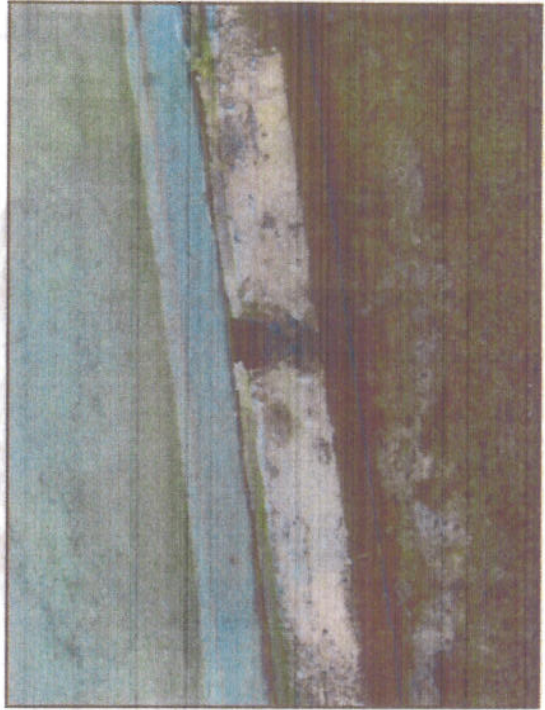
unnecessary information. As a result, in the event of an emergency, it may not be a use full tool for a first responder to quickly gather potential discharge/runoff information. The diagram should illustrate clearly (using different colors) the drainage pattern for all internal floor drains, and chemical and oil storage containment areas. The diagram should also illustrate the capacity of the detention basin, the valve associated with the basin, and the water bodies and flow pattern from the basin to surface waters and/or POTW. The EPA recommends Berkshire Power review and simplify the diagram.

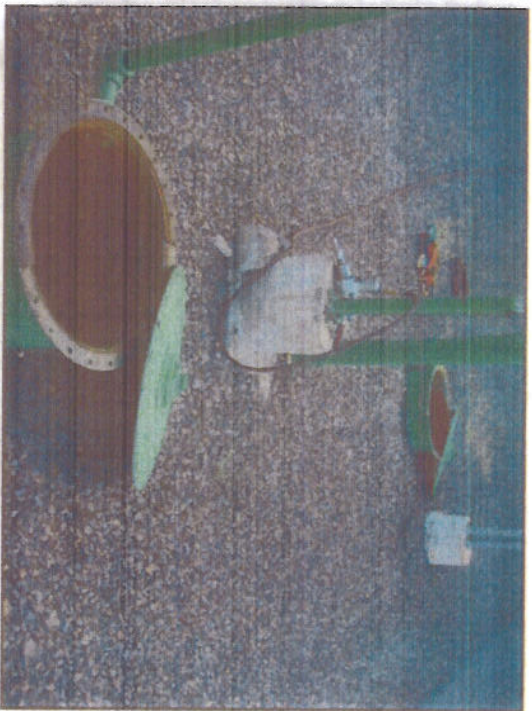
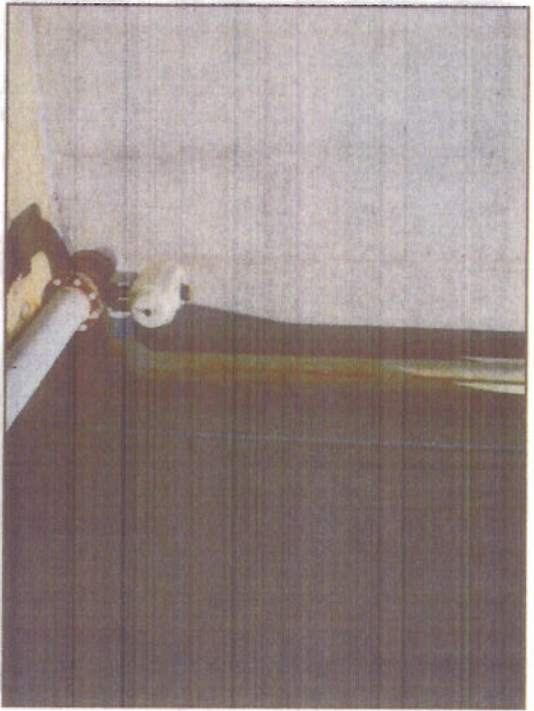
- During the inspection, Berkshire Power indicated that there is no combined sewer overflow outfalls between Berkshire Power's connection to the POTW and the POTW's headworks. This information should be noted in the SPCC Plan.

End of Comments.













U.S. ENVIRONMENTAL PROTECTION AGENCY SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

FOR USE AT ONSHORE FACILITIES (EXCLUDING PRODUCTION)

Overview of the Checklist

This checklist is designed to assist EPA inspectors in conducting a thorough and consistent inspection of a facility's compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112. It is a tool to help federal inspectors (or their contractors) record observations during the site visit and review of the SPCC Plan. While the checklist is comprehensive, the inspector should always refer to the SPCC rule in its entirety, the *SPCC Regional Inspector Guidance Document*, and other relevant guidance for evaluating compliance. This checklist must be completed in order for an inspection to count toward an agency measure (i.e., OEM/OECA inspection measures or GPRA).

The checklist is organized according to the SPCC rule. Each item in the checklist identifies the relevant section and paragraph in 40 CFR part 112 where that requirement is stated.

The compliance date for provisions from 2002 SPCC rule amendments that are more stringent than the 1974 rule has been extended until July 1, 2009 (See 72 FR 27443). More stringent provisions from the 2002 amendments are highlighted in *italicized and grayed text*. Where a 2002 amendment changes an entire provision, the 2002 requirements are shown in an *italicized and grayed* box with a heavy border. Where applicable, the alternative 1974 provision is shown in a gray box below the 2002 provision. These provisions are currently in effect for facilities that began operation on or before August 16, 2002.

Sections 112.1 through 112.6 specify the applicability of the rule and requirements for the preparation, implementation, and amendment of SPCC Plans. For these sections, the checklist includes data fields to be completed, as well as several questions with "yes" or "no" answers.

Sections 112.7 through 112.12 specify requirements for spill prevention, control, and countermeasures. For these sections, the inspector needs to evaluate whether the requirement is addressed adequately or inadequately in the SPCC Plan and whether it is implemented adequately in the field (either by field observation or record review). For the SPCC Plan and implementation in the field, if a requirement is addressed adequately, mark the "Yes" box in the appropriate column. If a requirement is not addressed adequately, mark the "No" box. If a requirement does not apply to the particular facility or the question asked is not appropriate for the facility, mark the "NA" box. Discrepancies or descriptions of inspector interpretation of No vs. NA may be documented in the comments box subsequent to each section. If a provision of the rule applies only to the SPCC Plan, the "Field" column is shaded.

Space is provided in each section to record comments. Additional space is available on the comments page at the end of the checklist. Comments should remain factual and support the evaluation of compliance.

Appendix A is a checklist for qualified facility requirements, which are not found in the main checklist. Note: Qualified facilities must meet the rule requirements in §112.7 and other applicable sections, except for deviations for environmental equivalence, impracticability, security, and bulk containers. The requirements for security and bulk containers for qualified facilities are found in §112.6(c) and (d).

Appendix B is for recording information about containers and other locations at the facility that require secondary containment.

Appendix C is a checklist for documentation of the tests and inspections the facility operator is required to keep with the SPCC Plan.

Appendix D is a checklist for oil removal contingency plans. A contingency plan is required if a facility determines that secondary containment is impracticable as provided in 40 CFR 112.7(d).



U.S. ENVIRONMENTAL PROTECTION AGENCY SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

FOR USE AT ONSHORE FACILITIES (EXCLUDING PRODUCTION)

FACILITY INFORMATION			
FACILITY NAME: <u>BEZKAHIRE Power, LLC</u>			
LAT: <u>42.0478</u>	LONG: <u>72.6514</u>	Section/Township/Range:	
ADDRESS: <u>36 MOYLAN LANE</u> <u>AGAWAM, MA</u>			
CITY: <u>AGAWAM</u>	STATE: <u>MA</u>	ZIP: <u>01001</u>	COUNTY: <u>HAMPDEN</u>
TELEPHONE: <u>413-789-0075</u>	FACILITY REPRESENTATIVE NAME: <u>FRANK BOSILE</u>		
OWNER NAME: <u>ENERGY INVESTORS FUND</u>			
OWNER ADDRESS: <u>63 KENDRICK ST, SUITE 101</u>			
CITY: <u>NEEDHAM</u>	STATE: <u>MA</u>	ZIP: <u>02494</u>	
OWNER CONTACT PERSON: <u>LUCAS MISSONG</u>			
TELEPHONE: <u>781-292-2009</u>	FAX:	EMAIL:	
FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER - IF NOT, PRINT "SAME"):			
OPERATOR ADDRESS:			
CITY:	STATE:	ZIP:	
TELEPHONE:	OPERATOR CONTACT PERSON:		
FACILITY TYPE: <u>POWER GENERATION</u>	NAICS CODE:		
HOURS PER DAY FACILITY ATTENDED: <u>24</u>	TOTAL FACILITY CAPACITY:		
TYPE(S) OF OIL STORED:			
LOCATED IN INDIAN COUNTRY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO RESERVATION NAME:			

INSPECTION INFORMATION		
INSPECTION DATE: <u>5/6/10</u>	TIME: <u>0900</u>	INSPECTION NUMBER:
LEAD INSPECTOR: <u>JOE CAHIZANO</u>		
OTHER INSPECTOR(S): <u>NONE</u>		

INSPECTOR ACKNOWLEDGMENT	
I performed an SPCC inspection at the facility specified above.	
INSPECTOR SIGNATURE: <u>[Signature]</u>	DATE:

FACILITY RESPONSE PLAN (FRP) APPLICABILITY

A non-transportation related onshore facility is required to prepare and implement an FRP as outlined in 40 CFR 112.20 if:

- ☐ The facility transfers oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 gallons, OR

The facility has a total oil storage capacity of at least 1 million gallons, and at least one of the following is true:

- ☐ The facility does not have secondary containment sufficiently large to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation.
☐ The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments.
☐ The facility is located such that a discharge would shut down a public drinking water intake.
☐ The facility has had a reportable discharge greater than or equal to 10,000 gallons in the past 5 years.

Facility has FRP: ☐ Yes ☒ No ☐ Not Required

FRP Number:

Facility has a completed and signed copy of Appendix D, Attachment C-II,

"Certification of the Applicability of the Substantial Harm Criteria."

☐ Yes ☐ No

Comments:

N/A

SPCC GENERAL APPLICABILITY—40 CFR 112.1

IS THE FACILITY REGULATED UNDER 40 CFR part 112?

The completely buried oil storage capacity is over 42,000 gallons, OR the aggregate aboveground oil storage capacity is over 1,320 gallons

☒ Yes ☐ No

AND

The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States (as defined in 40 CFR 110.1).

☒ Yes ☐ No

AFFECTED WATERWAY(S):

WETLANDS AND CT RIVER

DISTANCE:

400 yards TO WETLANDS

PATH: ON SITE DETENTION POND TO WETLANDS TO CT RIVER, OR DRAINS
* TO PUBLICLY OWNED TREATMENT WORKS TO CT RIVER.

Note: The following storage capacity is not considered in determining applicability of SPCC requirements:

- Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281.
- Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993.
- Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment).
- Containers smaller than 55 gallons.
- Permanently closed containers.
- Motive power containers

Does the facility have an SPCC Plan?

☒ Yes ☐ No

Comments:

SPCC Qualified Facility APPLICABILITY—40 CFR 112.3(g) [2006 Rule Provision]

112.3(g)(1)	The aggregate aboveground storage capacity is 10,000 gallons or less AND	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
112.3(g)(2)	The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons, OR the facility has had no two discharges as described in §112.1(b) exceeding 42 U.S. gallons within any twelve-month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule if the facility has been in operation for less than three years. (Note: Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this qualification determination.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

IF YES TO BOTH OF THE ABOVE, THEN THE FACILITY IS CONSIDERED A QUALIFIED FACILITY: **Complete relevant sections of this checklist and Appendix A.**

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3

Date facility began operations: JUNE 2000

Date of initial SPCC Plan preparation: 1998

Current Plan version (date/number): 10/2/08

112.3(a), (c)	For facilities (excluding farms) in operation prior to August 16, 2002, Plan amended to reflect 2002 SPCC requirements and changes implemented by July 1, 2009	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	For facilities (excluding farms) beginning operation between August 17, 2002, and July 1, 2009, Plan prepared and fully implemented by July 1, 2009	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
112.3(b), (c)	For facilities beginning operation after July 1, 2009, Plan prepared and fully implemented before beginning operations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA

112.3(d)	<i>[2002 Rule Requirement] [Except for self-certified Plans]</i>	
	Professional Engineer certification includes statement that the PE attests:	
	• PE is familiar with the requirements of 40 CFR part 112	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• PE or agent has visited and examined the facility	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• Plan is prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR part 112	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• Procedures for required inspections and testing have been established	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	• Plan is adequate for the facility	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA

[Requirement for facilities that began operation on or before August 16, 2002] [Except for self-certified Plans]

Plans should include evidence that the PE:

- Has examined the facility ☐ Yes ☐ No ☒ NA
- Is familiar with the provisions of this part ☐ Yes ☐ No ☒ NA
- Attests that the SPCC that Plan has been prepared in accordance with good engineering practices ☐ Yes ☐ No ☒ NA

PE Name: THOMAS LAUTURE

License No.: 27553

State: MA

Date of certification: 10/2/08

112.3(e)	<i>[2002 Rule Requirement]</i>	
	Plan available onsite if facility is attended at least 4 hours per day (If facility is unattended, please note nearest field office contact information in comments section below)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	<i>[Interim requirement for facilities that began operation on or before August 16, 2002]</i>	
	Plan available onsite if facility is attended at least 8 hours per day (If facility is unattended, please note nearest field office contact information in comments section below)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

Comments:

AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4

- 112.4(a)** Has the facility discharged more than 1,000 gallons of oil in a single reportable discharge or more than 42 gallons in each of two reportable discharges in any 12-month period (see 40 CFR part 110)? Note: A reportable discharge is a discharge as described in §112.1(b). ☐ Yes ☒ No
- If yes, was information submitted to the RA as required in §112.4(a)? ☐ Yes ☐ No ☒ NA
 - Date(s) of reportable discharge(s): ☐ Yes ☐ No
 - Were the discharges reported to the NRC? ☐ Yes ☐ No
- 112.4(d), (e)** Have changes required by the RA been implemented in the Plan and/or facility? ☐ Yes ☐ No ☒ NA

Comments:

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5

- 112.5(a)** Has there been a change at the facility that materially affects the potential for a discharge? ☐ Yes ☒ No
- If yes, was the Plan amended within six months of the change? ☐ Yes ☐ No
- 112.5(b)** Review and evaluation of the Plan completed at least once every 5 years? ☒ Yes ☐ No ☐ NA
- Following Plan review, and if amendment was required, was Plan amended within six months to include more effective prevention and control technology, if available? ☐ Yes ☐ No ☐ NA
- [2002 Rule Requirement]*
- Amendments implemented within six months of any Plan amendment? ☒ Yes ☐ No ☐ NA
- Plan review and evaluation documented in Plan? ☒ Yes ☐ No ☐ NA
- 112.5(c)** Professional Engineer certification of any technical Plan amendments in accordance with §112.3(d) *[Except for self-certified Plans]* ☒ Yes ☐ No ☐ NA

Name: THOMAS COVURE License No.: 27553 State: MA Date of certification: 10/2/08

Reason for amendment:

Amendments implemented within six months of any Plan amendment ☐ Yes ☐ No ☒ NA

Comments: NEXT SCHEDULE REVIEW & EVALUATION IS SEPTEMBER 2013,

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
Management approval at a level of authority to commit the necessary resources to fully implement the Plan		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Name: <u>FRANK BASILE</u>	Title: <u>GENERAL MANAGER</u>	Date: <u>10/2/08</u>	
Plan follows sequence of the rule or provides a cross-reference of requirements in the Plan and the rule		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed (Note: Relevant for inspection evaluation and testing baselines.)		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
112.7(a)(2)	If there are deviations from the requirements of the rule, the Plan states reasons for nonconformance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
	Alternative measures described in detail and provide equivalent environmental protection (Note: Inspector should document if the environmental equivalence is implemented in the field)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Describe each deviation and reasons for nonconformance <u>NO DEVIATIONS.</u>			
[2002 Rule Requirement]			
112.7(a)(3)	Plan includes diagram with location and contents of all regulated containers (including completely buried tanks otherwise exempt from the SPCC requirements), transfer stations, and connecting pipes (Note in comments any discrepancies between the diagram and what is observed in the field)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
112.7(a)(3)	Plan addresses each of the following:		
(i)	For each container, type of oil and storage capacity (see Appendix B) <u>FACILITY INFORMATION (AT TIME OF INSPECTION)</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(ii)	Discharge prevention measures, including procedures for routine handling of products	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(iii)	Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(iv)	Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(v)	Methods of disposal of recovered materials in accordance with applicable legal requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
(vi)	Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors contracted to respond to a discharge, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
[2002 Rule Requirement]			
112.7(a)(4)	Plan includes information and procedures that enable a person reporting a discharge as described in §112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge; the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in §112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and the names of individuals and/or organizations who have also been contacted (Not required if a facility has an FRP)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	

GENERAL SPCC REQUIREMENTS—40 CFR 112.7
PLAN
FIELD
[2002 Rule Requirement]
112.7(a)(5)

Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency (Not required if a facility has an FRP)

☒ Yes
☐ No
☐ NA

112.7(b)

Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure

☒ Yes
☐ No
☐ NA

☐ Yes
☐ No
☒ NA

112.7(c)

 Appropriate containment and/or diversionary structures or equipment provided to prevent a discharge as described in §112.1(b), except as provided in 112.7(k) of this section for qualified operational equipment, before cleanup occurs. *The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs* (1) For onshore facilities, one of the following or its equivalent: (i) dikes, berms, or retaining walls sufficiently impervious to contain oil, (ii) curbing, (iii) culverting, gutters or other drainage systems, (iv) weirs, booms or other barriers, (v) spill diversion ponds, (vi) retention ponds, or (vii) sorbent materials (See Appendix B)

☒ Yes
☐ No
☐ NA

☒ Yes
☐ No
☐ NA

112.7(d)

Determination(s) of impracticability of secondary containment

☐ Yes
☒ No

If YES:

Is the impracticability of secondary containment clearly demonstrated?

☐ Yes
☐ No
☒ NA

☐ Yes
☐ No
☒ NA

[2002 Rule Requirement]

For bulk storage containers, periodic integrity testing of containers and leak testing of the valves and piping associated with the container is conducted

☐ Yes
☐ No
☒ NA

☐ Yes
☐ No
☒ NA

Unless facility has FRP:

 (1) Contingency Plan following 40 CFR part 109 (see Appendix D checklist) is provided **AND**
☐ Yes
☐ No
☒ NA

(2) Written commitment of manpower, equipment, and materials required to control and remove any quantity of oil discharged that may be harmful

☐ Yes
☐ No
☒ NA

☐ Yes
☐ No
☒ NA

Comments concerning impracticability determination(s) for secondary containment:

NONE

Other comments:

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
112.7(e)	Inspections and tests conducted in accordance with written procedures	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Record of inspections or tests signed by supervisor or inspector and kept with Plan for at least 3 years (see Appendix C checklist)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
112.7(f) Personnel, training, and oil discharge prevention procedures [1973 Rule: 112.7(e)(10)]			
(1)	Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules and regulations; <i>general facility operations; and contents of SPCC Plan</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(2)	Person designated as accountable for discharge prevention at the facility	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<i>[2002 Rule Requirement]</i>		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(3)	Discharge prevention briefings conducted at least once a year for oil handling personnel	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
<i>[Interim requirement for facilities that began operation on or before August 16, 2002]</i>		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
112.7(g) Security (excluding production facilities) [1973 Rule: 112.7(e)(9)] [Except self-certified Plans]			
(1)	Facility fully fenced and gates are locked and/or guarded when facility is unattended	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2)	Master flow and drain valves and any other valves permitting direct outward flow of the container's contents to the surface have adequate security measures so that they remain in the closed position when in non-operating or non-standby status	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3)	Pump starter controls locked in "off" position and accessible only to authorized personnel when in non-operating/non-standby status	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(4)	Loading/unloading connections of oil pipelines or facility piping securely capped or blank-flanged when not in service or when in standby service for an extended period of time, including piping that is emptied of liquid content either by draining or by inert gas pressure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(5)	Adequate facility lighting commensurate with the type and location of the facility that assists in the discovery of discharges occurring during hours of darkness and to prevent discharges occurring through acts of vandalism	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Comments:			
112.7(h) Tank car and tank truck loading/unloading rack [1973 Rule: 112.7(4)]			
Note that a tank car/truck loading/unloading rack must be present for §112.7(h) to apply			
(1)	Does loading/unloading area (the location adjacent to the loading or unloading rack) drainage flow to catchment basin or treatment facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No • If NO, quick drainage system used	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	Containment system holds capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2)	Physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in loading/unloading areas (the location adjacent to the loading or unloading rack) to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3)	Lower-most drains and all outlets on tank cars/trucks inspected prior to filling/departure, and, if necessary ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
Comments:			
112.7(i) Brittle fracture evaluation of field-constructed aboveground containers [2002 Rule Requirement]			
Brittle fracture evaluation is conducted after tank repair/alteration/change in service that might affect the risk of a discharge or after a discharge/failure due to brittle fracture or other catastrophe, and appropriate action taken as necessary (for field-constructed aboveground containers)		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
112.7(j) State rules, regulations and guidelines and conformance with applicable sections of 40 CFR part 112 [1973 Rule: 112.7(e)]			
Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
112.7(k) Qualified oil-filled operational equipment secondary containment option [2006 Rule Amendment]			
(1)	Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> NA
	Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> NA
	<ul style="list-style-type: none"> If YES for either, secondary containment is required. (Note: Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this qualification determination.) See 112.7(c). 		
If NO and no secondary containment is provided	(2)(i) Facility procedure for inspections/monitoring program is established and documented	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	(2)(ii) Unless facility has FRP: Contingency plan following 40 CFR part 109 (see Appendix D checklist) is provided <u>AND</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	Written commitment of manpower, equipment, and materials required to control and remove any quantity of oil discharged that may be harmful	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Comments: <u>Facility has had no reportable discharges.</u>			

ONSHORE FACILITIES (EXCLUDING PRODUCTION)—112.8/112.12		PLAN	FIELD
112.8(b)/112.12(b) Facility Drainage [1973 Rule: 112.7(e)(1)]			
(1)	Drainage from diked storage areas is restrained by valves, OR manually activated pumps or ejectors are used and the condition of the accumulation is inspected prior to discharge to ensure no oil will be discharged.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2)	Valves from diked storage areas are manual, open-and-closed design (not flapper-type drain valves)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	If drainage is released directly to a watercourse and not into an onsite wastewater treatment plant, storm water inspected per §112.8(c)(3)(ii), (iii), and (iv) or §112.12(c)(3)(ii), (iii), and (iv)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(3)	Drainage from undiked areas with a potential for discharge designed to flow into ponds, lagoons, or catchment basins to retain oil or return it to facility. Catchment basin located away from flood areas.*	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(4)	If facility drainage not engineered as in (b)(3), the facility is equipped with a diversion system to retain oil in the facility in the event of a discharge.*	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

ONSHORE FACILITIES (EXCLUDING PRODUCTION)—112.8/112.12		PLAN	FIELD
(5) Are facility drainage waters continuously treated in more than one treatment unit and pump transfer is needed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES:			
• Two "lift" pumps available and at least one permanently installed		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Facility drainage systems engineered to prevent a discharge as described in §112.1(b) in the case of equipment failure or human error		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Comments:			
* These provisions apply only when a facility drainage system is used for containment; otherwise mark NA. .			
112.8(c)/112.12(c) Bulk Storage Containers [1973 Rule: 112.7(e)(2)] If bulk storage containers are not present, mark this section Non Applicable (NA). If present, complete this section and Appendix B of this checklist)			
(1) Containers compatible with material stored and conditions of storage such as pressure and temperature		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2) Except for mobile refuelers, construct secondary containment to hold capacity of largest container and sufficient freeboard for precipitation		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Diked areas sufficiently impervious to contain discharged oil		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Alternatively, any discharge to a drainage trench system will be safely confined in a facility catchment basin or holding pond		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3) Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open watercourse? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES:			
(i) Bypass valve normally sealed closed		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(ii) Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b)		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(iii) Bypass valve opened and resealed under responsible supervision		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(iv) Adequate records of drainage are kept; for example, records required under permits issued in accordance with 40 CFR 122.41(j)(2) and (m)(3)		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(4) For completely buried metallic tanks installed on or after January 10, 1974 (if not exempt from SPCC regulation because subject to all of the technical requirements of 40 CFR part 280 or 281):			
• Corrosion protection with coatings or cathodic protection compatible with local soil conditions		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
• Regular leak testing conducted		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(5) Partially buried or bunkered metallic tanks protected from corrosion with coatings or cathodic protection compatible with local soil conditions		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

ONSHORE FACILITIES (EXCLUDING PRODUCTION)—112.8/112.12
PLAN
FIELD

Comments:

(6) [Except for self-certified Plans]	[2002 Rule Requirement]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	Aboveground containers integrity tested by visual inspection and another technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing on a regular schedule and whenever material repairs are made		
	[Interim requirement for facilities that began operation on or before August 16, 2002]		
	Aboveground tanks integrity tested using such techniques as hydrostatic testing, visual inspection or a system of non-destructive shell thickness testing.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	Container supports and foundations regularly inspected	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	Records of inspections and tests maintained	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(7)	Leakage through defective internal heating coils controlled: <ul style="list-style-type: none"> Steam returns and exhaust lines from internal heating coils that discharge into an open water source are monitored for contamination, OR Steam returns and exhaust lines pass through a settling tank, skimmer, or other separation or retention system 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(8)	Each container is equipped with at least one of the following for liquid level sensing: (i) high liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station, or audible air vent in smaller facilities, (ii) high liquid level pump cutoff devices set to stop flow at a predetermined container content level, (iii) direct audible or code signal communication between container gauger and pumping station, (iv) fast response system (such as digital computers, telepulse, or direct vision gauges) <i>and a person is present to monitor gauges and the overall filling of bulk storage containers.</i> (v) liquid level sensing devices regularly tested to ensure proper operation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(9)	Effluent treatment facilities observed frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(10)	Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(11)	Mobile or portable containers positioned to prevent a discharge to prevent a discharge as described in §112.1(b).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	Mobile or portable containers (excluding mobile refuelers) have secondary containment with sufficient capacity to contain the largest single compartment or container <i>and sufficient freeboard to contain precipitation</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

ONSHORE FACILITIES (EXCLUDING PRODUCTION)—112.8/112.12		PLAN	FIELD
Comments:			
112.8(d)/112.12(d) Facility transfer operations, pumping, and facility process [1973 Rule: 112.7(e)(3)]			
(1)	[2002 Rule Requirement] Buried piping installed or replaced on or after August 16, 2002 has protective wrapping or coating	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	Buried piping installed or replaced on or after August 16, 2002 is cathodically protected or otherwise satisfies corrosion protection standards for piping in 40 CFR part 280 or 281	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	[Interim requirement for facilities that began operation on or before August 16, 2002] Buried piping has protective wrapping or coating and is cathodically protected if soil conditions warrant.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	Exposed buried piping is inspected for deterioration and corrosion damage is examined and corrected	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(2)	Piping terminal connection at the transfer point is marked as to origin and capped or blank-flanged when not in service or in standby service for an extended time	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3)	Pipe supports are properly designed to minimize abrasion and corrosion and allow for expansion and contraction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(4)	Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	[2002 Rule Requirement] Integrity and leak testing conducted on buried piping at time of installation, modification, construction, relocation, or replacement	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(5)	Vehicles warned so that no vehicle endangers aboveground piping and other oil transfer operations	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA

Comments:

Qualified Facilities Checklist

Appendix A: Qualified Facility Plan Requirements

Complete this Appendix only if the facility is a "qualified facility" as defined in §112.3(g). A qualified facility's Plan, whether certified by a PE or self-certified, must comply with all of the applicable requirements of §112.7 and subparts B and C of 40 CFR Part 112 referenced earlier in this checklist.

112.6—Qualified Facility Plan Requirements	Yes	No	NA
(a) Did the owner/operator of the qualified facility self-certify the SPCC Plan? <i>If NO, see requirements for 112.3(d) above. If YES, did the owner/operator certify in the Plan that:</i>			
(1) He or she is familiar with the requirements of 40 CFR part 112.			
(2) He or she has visited and examined the facility.			
(3) The Plan has been prepared in accordance with accepted and sound industry practices and standards.			
(4) Procedures for required inspections and testing have been established.			
(5) The Plan is being fully implemented.			
(6) The facility meets the qualification criteria set forth under §112.3 (g).			
(7) The Plan does not deviate from any requirements as allowed by §112.7(a)(2) and 112.7(d), except as described under §112.6(c).			
(8) Management has given full approval of the Plan and necessary resources have been committed for the Plan's full implementation.			
(b) Did the owner/operator self-certify any of the Plan's technical amendments?			
<i>If YES: Is the certification of any technical amendments in accordance with the provisions above (§112.6(a))?</i>			
(c)(1) and (d)(1) Environmental Equivalence. For each alternative measure allowed under §112.7(a)(2), the Plan is accompanied by a written statement by a PE that states the reason for nonconformance and describes the alternative method and how it provides equivalent environmental protection in accordance with §112.7(a)(2).			
(c)(2) and (d)(1) Impracticability. For each determination of impracticability of secondary containment pursuant to §112.7(d), the Plan clearly explains why secondary containment measures are not practicable at this facility and provides the alternative measures required in §112.7(d) in lieu of secondary containment.			
(c)(3) Security. The Plan contains one of the following: (i) The Plan complies with requirements under §112.7(g), OR (ii) The Plan complies with the requirements under §112.6(c)(3)(ii): Plan describes how the owner/operator secures and controls access to the oil handling, processing and storage areas; secures master flow and drain valves; prevents unauthorized access to starter controls on oil pumps; secures out-of-service and loading/unloading connections of oil pipelines; addresses the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.			
(c)(4) Bulk Storage Containers. The Plan contains one of the following: (i) The Plan complies with the requirements under §§112.8(c)(6) or 112.12(c)(6), as applicable; OR (ii) The Plan complies with the requirements under §112.6(c)(4)(ii): <ul style="list-style-type: none"> Aboveground containers, supports and foundations tested for integrity on a regular schedule and whenever repairs are made. Appropriate qualifications for personnel performing tests and inspections have been determined in accordance with industry standards. The frequency and type of testing and inspections have been determined in accordance with industry standards, taking into account container size, configuration and design. Container supports and foundations regularly inspected Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas Records of inspections and tests maintained 			
(d) Did a PE certify a portion of a qualified facility's self-certified Plan? <i>If YES, the PE must certify in the Plan that:</i>			
(d)(2) (i) He/she is familiar with the requirements of 40 CFR Part 112. (ii) He/she or a representative agent has visited and examined the facility. (iii) The alternative method of environmental equivalence in accordance with §112.7(a)(2) or the determination of impracticability and alternative measures in accordance with §112.7(d) is consistent with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112.			

SPCC FIELD INSPECTION AND PLAN REVIEW TABLE

Appendix B: Documentation of Field Observations for Containers and Associated Requirements

Inspectors should use this table to document observations of containers as needed.

Containers and Piping

Check containers for leaks, specifically looking for: drip marks, discoloration of tanks, puddles containing spilled or leaked material, corrosion, cracks, and localized dead vegetation, and standards/specifications of construction.

Check foundation for: cracks, discoloration, puddles containing spilled or leaked material, settling, gaps between container and foundation, and damage caused by vegetation roots.

Check piping for: droplets of stored material, discoloration, corrosion, bowing of pipe between supports, evidence of stored material seepage from valves or seals, and localized dead vegetation. (Document in comments section of §112.8(d) / §112.12(d).)

Secondary Containment (Active and Passive)

Check secondary containment for: containment system (including walls and floor) ability to contain oil such that oil will not escape the containment system before cleanup occurs, proper sizing, cracks, discoloration, presence of spilled or leaked material (standing liquid), erosion, corrosion, and valve conditions.

Check dike or berm systems for: level of precipitation in dike/available capacity, operational status of drainage valves (closed), dike or berm impermeability, debris, erosion, impermeability of the earthen floor/walls of diked area, and location/status of pipes, inlets, drainage around and beneath containers, presence of oil discharges within diked areas.

Check retention and drainage ponds for: erosion, available capacity, and presence of spilled or leaked material, debris, and stressed vegetation.

Check active measures (countermeasures) for: amount indicated in plan is available and appropriate; deployment procedures are realistic; material is located so that they are readily available; efficacy of discharge detection; availability of personnel and training, appropriateness of measures to prevent a discharge as described in §112.1(b).

[illegible]

SPCC INSPECTION AND TESTING CHECKLIST
Appendix C: Required Documentation of Tests and Inspections

Records of inspections and tests required by 40 CFR part 112 signed by the appropriate supervisor or inspector must be kept with the SPCC Plan for a period of three years. Records of inspections and tests conducted under usual and customary business practices will suffice. Documentation of the following inspections and tests should be kept with the SPCC Plan.

Inspection or Test	Documentation		Not Applicable
	Present	Not Present	
112.7—General SPCC Requirements			
<i>[2002 Rule Requirement]</i>			
(d) Integrity testing is conducted for bulk storage containers with no secondary containment system and for which an impracticability determination has been made			X
(d) Integrity and leak testing of valves and piping associated with bulk storage containers with no secondary containment system and for which an impracticability determination has been made			X
(i) Evaluate field-constructed aboveground containers for potential for brittle fracture or other catastrophic failure when the container undergoes a repair, alteration, reconstruction or change in service		X	X
112.8/112.12—Onshore facilities (excluding production)			
(b)(2) Storm water released from facility drainage directly to a watercourse is inspected and records of drainage are kept	X		
(c)(3)(iv) Rainwater released directly from diked containment areas to a storm drain or open watercourse is inspected and records of drainage are kept	X		
(c)(4) Regular leak testing of completely buried metallic storage tanks			X
(c)(6) Aboveground containers tested for integrity on a regular schedule		X	
(c)(6) Aboveground containers, supports and foundations visually inspected on a regular schedule.	X		
(c)(6) Diked areas inspected for accumulations of oil.	X		
(c)(8)(v) Liquid level sensing devices regularly tested to ensure proper operation	X		
(c)(9) Effluent treatment facilities are observed frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b)	X		
(d)(1) When buried piping is exposed, it is carefully inspected for deterioration and corrosion	X		X
(d)(4) Aboveground valves, piping and appurtenances are regularly inspected and the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are assessed	X		
<i>[2002 Rule Requirement]</i>			
(d)(4) Integrity and leak testing of buried piping is conducted at time of installation, modification, construction, relocation or replacement			
112.6—Qualified Facilities (Complete this section only if the facility is a "qualified facility" as defined in §112.3(g))			
(c)(4)(i) Comply with the requirements under §112.8(c)(6) or §112.12(c)(6) as applicable (see above);			X
OR			
(c)(4)(ii) Aboveground containers inspected and/or tested for integrity on a regular schedule and whenever repairs are made			X
Appropriate qualifications for personnel performing tests and inspections have been determined in accordance with industry standards			X
The frequency and type of testing and inspections have been determined in accordance with industry standards, taking into account container size, configuration and design			X